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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C.

APR 21 1993

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
 )  
Implementation of Section 17 )  
of the Cable Television )  
Consumer Protection and )  
Competition Act of 1992 )  
 )  
Compatibility Between )  
Cable Systems and Consumer )  
Electronics Equipment )

ET Docket No. 93-7

JOINT REPLY COMMENTS OF THE CABLE-CONSUMER ELECTRONICS  
COMPATIBILITY ADVISORY GROUP

The Cable-Consumer Electronics Compatibility Advisory Group ("Advisory Group") believes it is timely to provide a report on the ongoing discussions between representatives of the cable and consumer electronics industries concerning issues raised by Section 17 of the Cable Consumer Protection and Competition Act of 1992. Given the nature of our activities, and the divergence of our interests, we are not in a position to formulate "replies" to the comments submitted on March 22 by other parties. Still, we can acquaint the Commission with our continuing efforts to exchange information and seek consensus in the midst of a complex and contentious proceeding.

As was noted in the first-round comments filed by the Consumer Electronics Group of the Electronic Industries Association ("EIA/CEG"), representatives of that organization and the National Cable Television Association ("NCTA") began informal

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discussions about implementation of Section 17 in December 1992. Formal meetings of the Advisory Group, including executives and engineering staff from both industries, have been held on four separate occasions: January 11, February 23, March 12, and April 6. Another meeting is scheduled for May 20.

The two industry sectors continue to have quite distinct interests and differing points of view on many issues. Nonetheless, our discussions have increased mutual understanding. We have established subcommittees that are investigating -- and seeking consensus on -- such important issues as clear signal/broadband, national renewable security standards, cable-ready equipment, and sales promotion. The Advisory Committee has also made assignments to the Joint Engineering Committee ("JEC") that is jointly sponsored by EIA and NCTA.

At the most recent meeting of the Advisory Group on April 6, each of the industries presented to the other a succinct and concrete proposal for how best to address compatibility issues.<sup>1</sup> It was apparent that fundamental disagreements persist. Nonetheless, both sides agreed to focus on areas of potential agreement and committed to further discussion of the tuner-cable interface requirements (assigned to the JEC), exchange of information on channel counts, and cooperation in developing approaches to education of consumers about the characteristics and capabilities of both cable systems and consumer electronics

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1/ Copies of both documents are attached.

products. We plan to continue our search for areas of agreement and our efforts to enhance mutual understanding.

We will keep the Commission informed of our progress and stand ready to assist the Commission in subsequent phases of this proceeding.

Respectfully submitted,

CABLE-CONSUMER ELECTRONICS  
COMPATIBILITY ADVISORY GROUP

by: Walter Ciciora Jr.  
Walter Ciciora, Co-Chairman

by: Bruce Huber Jr.  
Bruce Huber, Co-Chairman

April 21, 1993

## CABLE INDUSTRY TASK FORCE PROPOSAL

### For Existing and New Inexpensive TVs & VCRs:

To improve functionality and compatibility, cable will provide on a cost basis, for subscribers who need and request it, supplementary equipment such as:

- 1) External "RF Bypass Switches" for optional purchase or rental. These may also be sold in the retail market place. Within a year after rules are in place, descrambling converters with a built-in "RF Bypass Switch" will be provided to subscribers upon request. Remote controlled descrambling converters will have this function remote controlled as well.
- 2) Within a year descrambling converters with built-in timers (for consecutive recording of different channels) -- or --  
"Universal" Remote controls for purchase or rental which include clocks and timers. These may also be sold in the retail market place -- or --  
"VCR Plus" units for purchase or rental. These are sold at retail.
- 3) For subscribers with subscriptions to two or more scrambled channels who request it. dual descrambling converters or two descrambling converters will be provided

**Cable - Consumer Electronics Compatibility  
Advisory Group**

**Consumer Electronics Proposal**

**April 5, 1993**

- If cable systems deliver all authorized signals simultaneously in the clear, within a defined maximum number of channels to all cable homes, the consumer electronics industry will agree to develop and sell cable ready television receivers and VCRs with improved immunity to direct pick up and improved characteristics for overload and local oscillator leakage and IF image interference.
- The consumer electronics industry agrees that a national standardized security system for analog signals, while desirable may not be practical within the time frame envisioned. However, there is a critical need for compatibility standards for compressed digital television signals, both in the clear and in scrambled formats. To accomplish this, the consumer electronics industry will take part in a voluntary joint committee which will, with all deliberate speed, work to develop the necessary compatibility standards and petition the FCC for their adoption.